

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA,)	
)	No. 18 C 3029
<i>Plaintiff,</i>)	
)	Hon. John Robert Blakey,
v.)	District Judge
)	
REYNALDO GUEVARA, <i>et al.</i> ,)	Hon. M. David Weisman,
)	Magistrate Judge
<i>Defendants.</i>)	

PARTIES' JOINT STATUS REPORT

Pursuant to the Court's order (Dkt. 411), the parties submit the following joint status report:

Expert Discovery

The following expert depositions have been scheduled:

- Jennifer Dysart – December 2 (see below for possible complications)
- Tom Tiderington – December 6 (see below for possible complications)
- Anthony W. Finnell – Plaintiff is still working to coordinate dates for Mr. Finnell
- Nancy Steblay – see below.

With regard to Nancy Steblay, the parties are conferring about the length of this deposition, which has impacted its scheduling. Plaintiff has disclosed this same expert to provide similar opinions on the same *Monell* topics relying on overlapping datasets in three other Guevara cases: *Bouto*, *Rodriguez*, and *Iglesias*. Plaintiff thus proposed that the parties consolidate the deposition of the same expert offering similar *Monell* opinions in multiple Guevara cases (to be applied to both sides). The parties are continuing to confer to see if they can reach agreement about such consolidation. The parties hope to complete their negotiations by the end of the week and if an agreement cannot be reached, they will bring a motion with the Court to resolve the dispute.

On November 7, 2022, the parties traveled to Arkansas for a hearing related to Plaintiff's motion to compel the deposition of Alberto Rodriguez. Mr. Rodriguez refused to testify. Based on this, Plaintiff has indicated that two of his experts will provide minimal supplements to their opinions before noon tomorrow.

If Defendants do not receive Dr. Dysart's supplement by noon tomorrow, they will be forced to reschedule her December 2 deposition. Additionally, Plaintiff's various experts have yet to respond to subpoenas for documents related to their opinions in this case. Plaintiff's counsel

previously indicated that they needed additional time and stated that they would “endeavor to respond” by November 18th. If these responses are not forthcoming and in sufficient time to prepare for the depositions, the expert deposition dates will have to rescheduled.

Dated: November 29, 2022

Respectfully submitted,

/s/ Sean Starr

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CERTIFICATE OF SERVICE

I, Eileen E. Rosen, an attorney, hereby certifies that on November 29, 2022 I caused the foregoing Joint Status Report to be filed using the Court's CM/ECF system, thereby effectuating service on all counsel of record.

/s/ Eileen E. Rosen
Attorney for Defendant City of Chicago